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**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

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In re : Chapter 11 Case No.
: :
MOTORS LIQUIDATION COMPANY, et al., : **09-50026 (REG)**
f/k/a General Motors Corp., et al. :
: :
Debtors. : (Jointly Administered)
: :
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**MOTORS LIQUIDATION COMPANY ET AL.'S (f/k/a GENERAL MOTORS
CORPORATION ET AL.) STATEMENT OF ISSUE PRESENTED ON APPEAL
AND COUNTERDESIGNATION OF ADDITIONAL ITEMS
TO BE INCLUDED IN THE RECORD ON APPEAL IN CONNECTION
WITH THE APPEAL OF STANLEY R. STASKO**

Pursuant to Rule 8006 of the Federal Rules of Bankruptcy Procedure,
Motors Liquidation Company (f/k/a General Motors Corporation) and its affiliated
debtors, as debtors (collectively, the “**Debtors**”), submit the following statement of issue
presented on appeal and counterdesignation of additional items to be included in the
record in connection with the appeal of Stanley R. Stasko (“**Stasko**”) from the order of
the United States Bankruptcy Court for the Southern District of New York (the

“Bankruptcy Court”) (Robert E. Gerber, J.) denying Stasko’s motion for relief from the automatic stay, entered on April 21, 2010 (the “Order”) [Docket No. 5532].¹

STATEMENT OF ISSUE ON APPEAL

1. Has Appellant met his burden of establishing that the Bankruptcy Court abused its discretion in granting the Order denying Appellant’s motion for relief from the automatic stay?

COUNTERDESIGNATION OF RECORD

Designation Number	Date of Filing	Docket Number	Description
1	6/01/2009	21	Affidavit of Frederick A. Henderson Pursuant to Local Bankruptcy Rule 1007-2
2	6/27/2009	2649	Amended and Restated Master Sale & Purchase Agreement and Certain Exhibits and Schedules Thereto
3	9/16/2009	4079	Order Establishing the Deadline for Filing Proofs of Claim
4	02/19/2010	5151	Motion for Relief from Stay filed by Stanley R. Stasko
5	04/01/2010	5390	Debtors’ Opposition to the Motion of Stanley Stasko Pursuant to 11 U.S.C. § 362(d) Modifying the Automatic Stay Imposed by 11 U.S.C. 362(a) After Material

¹ This Counterdesignation designates certain items that have been designated in Appellant’s Designation of Items to be Included in the Record on Appeal (“**Stasko’s Designation**”), to avoid any confusion regarding which items are included in the record on appeal because Stasko’s Designation failed to provide a date with respect to such items. The Debtors reserve the right to amend this Counterdesignation of Additional Items to be Included in the Record on Appeal. For items designated, the designation includes all documents referenced within the particular document number, including, without limitation, all exhibits, attachments, declarations, and affidavits related thereto.

			Default
6	04/05/2010	5442	Response of Stanley R. Stasko to Debtor's Opposition to Motion Modifying the Automatic Stay
7	04/09/2010	5509	Transcript Regarding Hearing Held on 04/08/2010
8	04/21/2010	5532	Order Denying Motion of Stanley R. Stasko for Relief from the Automatic Stay
9	05/03/2010	5736	Notice of Appeal filed by Stanley R. Stasko
10	6/1/2009 – 05/21/2010	N/A	Docket for <i>Motors Liquidation Company, et al. (f/k/a General Motors Corp. et al.)</i> , Ch. 11 Case No. 09-50026 (REG) for 6/1/2009 through 05/21/2010

Dated: May 21, 2010
New York, New York

/s/ Joseph H. Smolinsky _____

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